

ETHICS CHARTER

and Responsible Sourcing Policy

Maison Herink, a family-owned silversmithing workshop founded in 1962, designs and manufactures silver pieces in France. As a member of the Responsible Jewellery Council (RJC), the Company is certified against the Code of Practices (COP) and the Chain of Custody (CoC) standard. As such, it undertakes to demonstrate, through independent third-party verification, its compliance with the commitments set out below.

This Charter applies to management, all employees and visitors to our premises. It is communicated to our employees, suppliers, customers and service providers, and is published on our website. We expect our business partners to share these principles and we use our influence to promote them.

1. Compliance and governance

- We comply with all applicable laws and regulations, as well as United Nations sanctions and resolutions. Where applicable law and the RJC Code of Practices differ, we apply the more stringent requirement.
- An RJC representative, a member of senior staff, is responsible for implementing this Charter and our management system. Relevant employees are trained in their responsibilities.
- Top management reviews this Charter and its implementation at least once a year. Records relating to our RJC commitments are kept for at least five years, or longer where required by law.

2. Human rights

We respect all internationally recognised human rights, in line with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. We carry out due diligence to identify, prevent, mitigate and remedy any adverse impacts to which our operations or business relationships may be linked. Should an adverse impact be confirmed, we would cease the activity concerned, contribute to its remediation and implement corrective actions to prevent its recurrence.

3. Working conditions

- We reject child labour and forced labour in all their forms, as well as human trafficking and undeclared work. Young persons under 18 are never assigned to hazardous work.
- We provide written employment terms, working hours and remuneration in accordance with the law and our collective agreement.
- We respect freedom of association and the right to collective bargaining, in particular through dialogue with our employee representative committee (CSE).
- We prohibit all forms of discrimination, violence and harassment, including psychological and sexual harassment. We promote diversity, equity and inclusion in recruitment, career development and employment conditions.
- Our disciplinary procedure is written, communicated and applied equally to all, with respect for the dignity of every person.

4. Health and safety

The health and safety of our employees and visitors take precedence over any economic consideration. We assess occupational risks, including those related to hazardous substances, and implement the necessary preventive measures. The safety of people takes precedence over the protection of property.

5. Environment

We are committed to protecting the environment, meeting our regulatory obligations and improving our performance: control of hazardous substances, sorting and treatment of waste through appropriate channels, recycling of precious metals and responsible use of water and energy.

6. Business ethics

- **Bribery:** we prohibit all forms of corruption and facilitation payments, whether made directly or through intermediaries. Gifts and hospitality are governed by our anti-corruption policy. No employee will be penalised for refusing to take part in bribery or for reporting a concern in good faith, even if this results in the Company losing business.
- **Know Your Counterparty:** we apply a KYC policy to our suppliers and customers. We verify their identity, their legitimacy and that they do not appear on sanctions lists, and we monitor unusual transactions. We do not take part in any money laundering or terrorist financing and we report any suspicion to the competent authorities. We do not accept any cash payments.
- **Security:** we protect our employees, visitors and products against theft, damage or substitution, both on our premises and during shipments, using specialised service providers.
- **Claims:** all communications about our RJC membership, our certifications or the provenance of our materials are accurate, verifiable and consistent with RJC rules. Any inaccurate claim would be withdrawn and corrected.

7. Responsible sourcing policy

In line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Annex II, we implement the OECD five-step framework for the precious metals we purchase. We are committed to not contributing to the financing of conflict and to not sourcing from sources linked to the following situations.

Serious abuses. We will neither tolerate, facilitate, support nor profit from any of the following abuses associated with the extraction, transport or trade of minerals: torture and cruel, inhuman or degrading treatment; forced or compulsory labour; the worst forms of child labour; other gross human rights violations and abuses, such as widespread sexual violence; war crimes, other serious violations of international humanitarian law, crimes against humanity or genocide. We will immediately suspend or discontinue engagement with any supplier where we identify a reasonable risk that it is committing such abuses, sourcing from third parties committing them, or linked to them.

Non-state armed groups. We will not provide any direct or indirect support, including through the procurement of minerals, payments or logistical assistance, to non-state armed groups or their affiliates that illegally control mine sites, transportation routes or trading points, or that illegally tax or extort money or minerals. We will immediately suspend or discontinue engagement with any supplier where we identify a reasonable risk of such links.

Public or private security forces. The role of such forces is to ensure the security of people and property in accordance with the rule of law and human rights. We will not provide any direct or indirect support to security forces that commit the abuses described above or act illegally.

Bribery, fraudulent misrepresentation, money laundering and taxes. We will not offer, promise or give any bribe, and will resist any solicitation aimed at concealing the origin of minerals or misrepresenting taxes, fees and royalties due to governments. We will support the elimination of money laundering and the effective payment of such taxes where we identify a related risk. In such situations, we will implement a risk management plan and suspend engagement if mitigation efforts fail.

Should we trade in diamonds, we would comply with the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

8. Chain of Custody (CoC)

For our CoC-certified production, we undertake to:

- source CoC material exclusively from RJC CoC-certified entities, upon presentation of a compliant transfer document;
- identify, segregate and trace CoC material throughout production, separately from non-CoC material;
- identify non-CoC components permitted by the RJC and state them as excluded in our declarations;
- assess the risk of non-conformance associated with service companies handling our CoC material;
- record and address any non-conformance, and downgrade to non-CoC any material whose status cannot be demonstrated.

9. Complaints and grievance mechanism

Any internal or external stakeholder may raise a concern about our practices, human rights, working conditions, corruption or our supply chain, including anonymously, at the following address:

s.herink@herink.fr

Every report is handled confidentially, impartially and within a reasonable timeframe. No retaliation will be taken against anyone who raises a concern in good faith. Use of this mechanism does not prevent anyone from pursuing other remedies, including administrative or judicial ones. Reports and their outcomes are recorded and reviewed to prevent similar situations from recurring.

Rebais, France, 17 September 2026

Stéphane HERINK
President

Signature:

